

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Ivory Watkins
(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:25-cv-1033 SB
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

MULTNOMAH COUNTY
INVERNESS JAIL

Jury Trial Demanded

☒ Yes

☐ No

(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: IVORY WATKINS
Street Address: 11540 NE INVERNESS DR.
City, State & Zip Code: PORTLAND, ORE 97220
Telephone No.: (503) 888-9116

Defendant No. 1

Name: MULTNOMAH COUNTY INVERNESS JAIL
Street Address: 11540 NE INVERNESS DR.
City, State & Zip Code: PORTLAND, OR 97220
Telephone No.: _____

Defendant No. 2

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 3

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 4

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

Violates EIGHTH AMENDMENT Violates State Health
Code and unsanitary living conditions

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

IN NOVEMBER OF 2024 I NOTICED "BLACK MOLD" IN THE
SHOWERS OF DORM 10 IN INTERNESS JAIL (MULTNOMAH
COUNTY) IN OR ABOUT JANUARY 2025 I STARTED GETTING
SICK. BETWEEN JANUARY AND MARCH I SENT 7 MEDICAL
FORM REQUESTING TO BE TESTED. AS MY COUGH PERSISTED
I WAS GIVEN AN INHALER (ALBUTEROL). I WROTE
GRIEVANCES COMPLAINING ABOUT THE "BLACK MOLD" IN THE
SHOWERS. I CONTINUE TO HAVE COLD LIKE SYMPTOMS
I HAVE ~~STILL~~ EXHAUSTED ALL REMEDIES.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

WHEREFORE LORY WATKINS RESPECTFULLY PRAY THAT
THIS COURT ENTER JUDGEMENT GRANTING LORY
WATKINS A DECLARATION THAT THE ACTS AND OMISSIONS
DESCRIBED HEREIN VIOLATE HIS RIGHTS UNDER THE
CONSTITUTION AND LAWS OF THE UNITED STATES AND
GRANTING LORY WATKINS COMPENSATORY DAMAGES IN
THE AMOUNT OF \$150,000 AGAINST THE JAIL IN THE
NAME OF INVERNESS OF MULTNOMAH COUNTY. LORY WATKINS
ALSO SEEKS \$ 50,000 IN PUNITIVE DAMAGES AS WELL
AS FOR IT TO BE BROUGHT UP TO CODE

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4th day of JUNE, 2025.


(Signature of Plaintiff)